CONSTRUCTION OF CLAIM TERMS, PHRASES AND CLAUSES OF U.S. PATENT NO. 5,910,988 EXHIBIT 2

Supporting Evidence	Claim 1	The language of the claims; '988 patent, including cols. 3:25-35, 4:60-5:9, 14:19-27, 20:66-21:32, and 21:49-60, and the corresponding sections of the '137 patent; '137 patent file history, including 2/16/1999 Petition to Make Special; FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000); D014161-185 (DataTreasury Corp.: Review of Business Strategy, dated February 2000); D059384; D056177-182; D034206-207; and D059799.	The language of the claims; '988 patent, including cols. 7:52-8:43, 9:9-10:67, 16:66-19:64, and 20:66-21:32, and Figs. 3A, 3B and 8, and the corresponding sections of the '137 patent; '137 patent, including cols. 21:62-22:40 and Fig. 10; '988 patent file history, including 10/23/1998 Petition to Make Special, and 2/5/1999 Amendment and Response, including p. 4; '137 patent file history, including 2/16/1999 Petition to Make Special; PLAINTIFF DATATREASURY'S RESPONSE TO DEFENDANTS INGENICO'S THREE MOTIONS FOR SUMMARY JUDGMENT OF INVALIDITY, including all Declarations and Rebuttal Reports of DataTreasury's Expert John E. Hiles; FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000); D014161-185 (DataTreasury Corp.: Review of Business Strategy, dated February 2000); D059384; D056177-182; D034206-207; and D059799.
SVPCo's Preliminary Construction	Cla	a system that centrally manages paper transaction data, centrally stores paper transaction data, and centrally generates informative reports based on paper transaction data extracted from remotely captured images of both documents and receipts	information that identifies the remote data access subsystem, or a subsystem that is a part of the remote data access subsystem
Claim Term, Phrase or Clause		Preamble: "system for central management, storage and report generation of remotely captured paper transactions from documents and receipts"	"subsystem identification information"

Claim Term, Phrase or Clause	SVPCo's Preliminary Construction	Supporting Evidence
"capturing paper transaction data"	acquiring the paper transaction data via the capture of images of documents and receipts from which the paper transaction data is extracted, and recording the same in digital electronic form	The language of the claims; '988 patent, including cols. 5:45-57, 7:52-60, and 9:9-10:67, and Figs. 2, 3A and 3B, and the corresponding sections of the '137 patent; '988 patent file history, including 10/23/1998 Petition to Make Special; '137 patent file history, including 2/16/1999 Petition to Make Special; U.S. Patent Appln. No. 09/454,492 (Ballard) prosecution history, including 7/3/2001 Office Action, 1/2/2002 Amendment in Response to the First Office Action, and 4/8/2003 Amendment; MICROSOFT PRESS COMPUTER DICTIONARY (3d ed. 1997); FOCO D000970-1043 and D059799.
"capturing subsystem identification information"	acquiring the subsystem identification information, and recording the same in digital electronic form	The language of the claims; '988 patent, including cols. 5:45-57, 7:52-60, and 9:9-10:67, and Figs. 2, 3A and 3B, and the corresponding sections of the '137 patent; '988 patent file history, including 10/23/1998 Petition to Make Special, and 2/5/1999 Amendment and Response, including p. 4; '137 patent file history, including 2/16/1999 Petition to Make Special; U.S. Patent Appln. No. 09/454,492 (Ballard) prosecution history, including 7/3/2001 Office Action, 1/2/2002 Amendment; Microsoft Press Computer Diction, and 4/8/2003 Amendment; Microsoft Press Computer Dictionary (3d ed. 1997); FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000); and D059799.
"documents and receipts"	written or printed papers [documents] and written or printed paper acknowledgments of something received such as money or goods [receipts], but not "checks" as recited in the '137 patent	The language of the claims; '988 patent, including cols. 8:32-39 and 9:9-10:67, and Fig. 3B, and the corresponding sections of the '137 patent; NEW WEBSTER'S COMPREHENSIVE DICTIONARY (1985) (written or printed paper; written acknowledgement of something received, as money or goods); and WEBSTER'S THIRD NEW INTERNATIONAL DICTIONARY (1993) (a writing acknowledging the taking or receiving of goods or money delivered or paid).

Claim Term, Phrase or Clause	SVPCo's Preliminary Construction	Supporting Evidence
"central" of "central data processing subsystem"	a centralized subsystem, that is, a subsystem located at the center of the system communicatively connected, directly or indirectly, to all of the remote data access subsystems and to which all of the remote data access subsystems transmit encrypted images of documents and receipts containing paper transaction data and encrypted subsystem identification information	The language of the claims; '988 patent, including cols. 1:9-15, 4:60-5:9 and 14:19-27, and Figs. 1, 4 and 6-9, and the corresponding sections of the '137 patent; '988 patent file history, including 10/23/1998 Petition to Make Special; '137 patent file history, including 2/16/1999 Petition to Make Special; U.S. Patent Appln. No. 09/454,492 (Ballard) prosecution history, including 7/3/2001 Office Action, 1/2/2002 Amendment in Response to the First Office Action, and 4/8/2003 Amendment; IBM DICTIONARY OF COMPUTING (10th ed. 1994) (centralized network as synonym for star network; a radial, or star-like, configuration of nodes connected to a central controller or computer in which each node exchanges data directly with the central node; Fig. 140); MICROSOFT PRESS COMPUTER DICTIONARY (3d ed. 1997) (each device (node) is connected to a central computer in a star-shaped configuration; a network consisting of a central computer (the hub) surrounded by terminals); DICTIONARY OF COMPUTERS, DATA PROCESSING & TELECOMMUNICATIONS (1984) (centralized network as synonym for star network; a network configuration in which there is only one path between a central or controlling node and each end-point node); DICTIONARY OF INFORMATION TECHNOLOGY (3d ed. 1989) (each node is connected only to one central controller (host)); DICTIONARY OF COMPUTING: DATA COMMUNICATIONS, HARDWARE AND SOFTWARE BASICS, DIGITAL ELECTRONICS (1982); THE NEW IEEE STANDARD DICTIONARY OF ELECTRICAL AND ELECTRONICS TERMS (5th ed. 1993); FOCO D000970-1043 (DataTreasury Corp.: Review of Business Strategy, dated February 2000).

Claim Term.	SVPCo's	
Phrase or Clause	Freliminary Construction	Supporting Evidence
In the context of a "central	centrally systematically	The language of the claims; '988 patent, including cols. 1:9-15, 2:3-
data processing subsystem":	performing operations upon both	12, 4:52-53, 4:60-5:9, 14:19-27, 20:66-21:32, and 21:49-60, Figs. 1,
	the paper transaction data and the	3A and 8, and abstract, and the corresponding sections of the '137
"processing the paper	subsystem identification	patent; '988 patent file history, including 10/23/1998 Petition to
transaction data and the	information, necessarily	Make Special; '137 patent file history, including 2/16/1999 Petition
subsystem identification	including: decrypting the	to Make Special; IBM DICTIONARY OF COMPUTING (10th ed. 1994)
information"	received encrypted images of	(systematic performance of operations upon data); DICTIONARY OF
	documents and receipts and the	COMPUTERS, DATA PROCESSING & TELECOMMUNICATIONS (1984)
	received encrypted subsystem	(data processing performed at a single, central location on data from
	identification information,	several locations); PLAINTIFF DATATREASURY'S RESPONSE TO
	extracting the paper transaction	DEFENDANTS INGENICO'S THREE MOTIONS FOR SUMMARY
	data from the images, performing	JUDGMENT OF INVALIDITY, including all Declarations and Rebuttal
	meaningful analysis of the paper	Reports of DataTreasury's Expert John E. Hiles; FOCO D000970-
	transaction data and the	1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January
	subsystem identification	2000); D014161-185 (DataTreasury Corp.: Review of Business
	information, and generating	Strategy, dated February 2000); D059384; D056177-182; D034206-
	informative reports based on the	207; and D059799.
	paper transaction data and the	
	subsystem identification	
	information, in contrast to the	
	processing overhead of operating	
	systems and networks and for	
	implementing communication	
	protocols	

Claim Term, Phrase or Clause	SVPC6's Freilminary Construction	Supporting Evidence
In the context of a "central data processing subsystem": "sending the paper transaction data and the subsystem identification information"	electronically sending both the extracted paper transaction data and the subsystem identification information from the central data processing subsystem to a location outside of the central data processing subsystem	The language of the claims; '988 patent, including cols. 1:9-15, 2:3-12, 4:60-5:9, 15:31-34, 20:11-65 and 22:9-12, Figs. 1 and 6, and abstract, and the corresponding sections of the '137 patent; '988 patent file history, including 10/23/1998 Petition to Make Special; '137 patent file history, including 2/16/1999 Petition to Make Special; and FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000).
In the context of a "central data processing subsystem": "verifying the paper transaction data and the subsystem identification information"	centrally checking or testing the accuracy, exactness or authenticity of both the extracted paper transaction data and the subsystem identification information by comparison with known data or a recognized standard or authority	The language of the claims; '988 patent, including cols. 1:27-39, 2:23-67, 3:1-15, 4:18-21 and 14:62-15:9, Fig. 1, and abstract, and the corresponding sections of the '137 patent; '137 patent, including cols. 21:62-22:40 and Fig. 10; '988 patent file history, including 10/23/1998 Petition to Make Special, 12/29/1998 Office Action, and 2/5/1999 Amendment and Response, including p. 4; '137 patent file history, including 2/16/1999 Petition to Make Special; WO99/11021 prosecution history, including 10/24/2005 Communication; New Webster 's Comprehensive Dictionary (1985) (to examine or test the correctness or authenticity of); Webster 's Third New International Dictionary (1993) (to check or test the accuracy or exactness of: confirm the truth or truthfulness of by or as if by comparison with known data or a recognized standard or authority); FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000); D014161-185 (DataTreasury Corp.: Review of Business Strategy, dated February 2000); D059384; D056177-182; and D034206-207.

Claim Term, Phrase or Clause	SVPCo's Preliminary Construction	Supporting Evidence
In the context of a "central data processing subsystem": "storing the paper transaction data and the subsystem identification information"	centrally electronically recording both the extracted paper transaction data and the subsystem identification information in permanent or semipermanent form in auxiliary storage devices that permit later retrieval of that data and information	The language of the claims; '988 patent, including cols. 4:60-5:9, 7:25-28, 14:19-42, and 16:13-65, Figs. 1 and 6, and the corresponding sections of the '137 patent; '988 patent file history, including 10/23/1998 Petition to Make Special; '137 patent file history, including 2/16/1999 Petition to Make Special; IBM DICTIONARY OF COMPUTING (10th ed. 1994) (The terms storage and memory are sometimes used loosely as synonyms. In a more precise and useful sense, the term memory pertains to the part of storage in which instructions are executed (main storage or execution space) and excludes auxiliary storage devices such as disks, diskettes, mass storage devices, and magnetic tape.); MICROSOFT PRESS COMPUTER DICTIONARY (3d ed. 1997) (recording computer data in permanent or semi-permanent form in auxiliary storage devices); FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000); D014161-185 (DataTreasury Corp.: Review of Business Strategy, dated February 2000); and D059799.
	Clair	Claim 26
Preamble: "method for central management, storage and verification of remotely captured paper transactions from documents and receipts"	a method for centrally managing paper transaction data, centrally storing paper transaction data, and centrally verifying paper transaction data extracted from remotely captured images of both documents and receipts	The language of the claims; '988 patent, including cols. 3:25-35, 4:60-5:9, 14:19-27, 20:66-21:32, and 21:49-60, and the corresponding sections of the '137 patent; '137 patent file history, including 2/16/1999 Petition to Make Special; FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000); D014161-185 (DataTreasury Corp.: Review of Business Strategy, dated February 2000); D059384; D056177-182; D034206-207; and D059799.

Supporting Evidence	The language of the claims; '988 patent, including cols. 1:27-39, 2:23-67, 3:1-15, 4:18-21 and 14:62-15:9, Fig. 1, and abstract, and the corresponding sections of the '137 patent; '137 patent, including cols. 21:62-22:40 and Fig. 10; '988 patent file history, including 10/23/1998 Petition to Make Special; '137 patent file history, including 2/16/1999 Petition to Make Special; NEW WEBSTER'S COMPREHENSIVE DICTIONARY (1985) (to examine or test the correctness or authenticity of); WEBSTER'S THIRD NEW INTERNATIONAL DICTIONARY (1993) (to check or test the accuracy or exactness of: confirm the truth or truthfulness of by or as if by comparison with known data or a recognized standard or authority); FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000); D014161-185 (DataTreasury Corp.: Review of Business Strategy, dated February 2000); D059384; D056177-182; and D034206-207.	The language of the claims; '988 patent, including cols. 5:45-57, 7:52-60, and 20:66-21:32, and Fig. 3B, and the corresponding sections of the '137 patent; '988 patent file history, including 10/23/1998 Petition to Make Special, and 2/5/1999 Amendment and Response, including p. 4; '137 patent file history, including 2/16/1999 Petition to Make Special; IBM DICTIONARY OF COMPUTING (10th ed. 1994) (an electronic representation of an original document recorded by a scanning device); FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000); D059384; D056177-182; D034206-207; and D059799.
SVPCo's Preliminary Construction	centrally checking or testing the accuracy, exactness or authenticity of the extracted paper transaction data by comparison with known data or a recognized standard or authority Preamble is limiting.	an electronic representation of an original document or receipt, such as a digital bitmap representation called a Bitmap Image, digitally recorded by an opto-electronic scanning or other recording device
Claim Term Phrase or Clause	Preamble: "verification of remotely captured paper transactions"	"image"

Claim Term, Phrase or Clause "subsystem identification	Prefirminary Construction information that identifies the	Supporting Evidence The language of the claims; '988 patent, including cols. 7:52-8:43,
information"	remote data access subsystem, or a subsystem that is a part of the remote data access subsystem	9:9-10:67, 16:66-19:64, and 20:66-21:32, and Figs. 3A, 3B and 8, and the corresponding sections of the '137 patent; '137 patent, including cols. 21:62-22:40 and Fig. 10; '988 patent file history, including 10/23/1998 Petition to Make Special, and 2/5/1999 Amendment and Response, including p. 4; '137 patent file history, including 2/16/1999 Petition to Make Special; PLAINTIFF DATATREASURY'S RESPONSE TO DEFENDANTS INGENICO'S THREE MOTIONS FOR SUMMARY JUDGMENT OF INVALIDITY, including all Declarations and Rebuttal Reports of DataTreasury's Expert John E. Hiles; FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000); D014161-185 (DataTreasury Corp.: Review of Business Strategy, dated February 2000); D059384; D056177-182; D034206-207; and D059799.

Claim Term, Phrase or Clause	SVPCo's Prefinitiary Construction	Supporting Evidence
"central location"	"central location" is synonymous and used interchangeably with a central data processing subsystem at that location: a centralized subsystem, that is, a subsystem located at the center of the system located, directly or indirectly, to all of the remote data access subsystems transmit encrypted images of documents and receipts containing paper transaction data and encrypted subsystem identification information	The language of the claims; '988 patent, including cols. 1:9-15, 4:60-5:9 and 14:19-27, and Figs. 1, 4 and 6-9, and the corresponding sections of the '137 patent; '988 patent file history, including 10/23/1998 Petition to Make Special; '137 patent file history, including 2/16/1999 Petition to Make Special; U.S. Patent Appln. No. 09/454,492 (Ballard) prosecution history, including 7/3/2001 Office Action, and 4/8/2003 Amendment; IBM DICTIONARY OF COMPUTING (10th ed. 1994) (centralized network as synonym for star network; a radial, or star-like, configuration of nodes connected to a central controller or computer in which each node exchanges data directly with the central node; Fig. 140); MICROSOFT PRESS COMPUTER DICTIONARY (3d ed. 1997) (each device (node) is connected to a central computer in a star-shaped configuration; a network consisting of a central computer (the hub) surrounded by terminals); DICTIONARY OF COMPUTERS, DATA PROCESSING & TELECOMMUNICATIONS (1984) (centralized network as synonym for star network; a network configuration in which there is only one path between a central or confrolling node and each end-point node); DICTIONARY OF INFORMATION TECHNOLOGY (3d ed. 1989) (each node is connected only to one central controller (host)); DICTIONARY OF COMPUTING: DATA COMMUNICATIONS, HARDWARE AND SOFTWARE BASICS, DIGITAL ELECTRONICS (1982); THE NEW IEEE STANDARD DICTIONARY OF ELECTRICAL AND ELECTRONICS TERMS (5th ed. 1993); FOCO D000970-1043 (DataTreasury Corp.: Review of Business Strategy, dated February 2000).

- Claim Term, Phrase or Clause	SVPCo's Preliminary Construction	Supporting Evidence
"collecting [paper] transaction data at a central location"	gathering together or accumulating extracted paper transaction data by a central data processing subsystem	The language of the claims; '988 patent, including cols. 4:60-5:9 and 14:28-42, and Figs. 1 and 6, and the corresponding sections of the '137 patent; '988 patent file history, including 10/23/1998 Petition to Make Special; '137 patent file history, including 2/16/1999 Petition to Make Special; NEW WEBSTER'S COMPREHENSIVE DICTIONARY (1985) (to gather; to accumulate); and FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000).
"processing [paper] transaction data at a central location"	centrally systematically performing operations upon the paper transaction data, necessarily including: decrypting the received encrypted images of documents and receipts, extracting the paper transaction data from the images, performing meaningful analysis of the paper transaction data, and generating informative reports based on the paper transaction data, in contrast to the processing overhead of operating systems and networks and for implementing communication protocols	The language of the claims; '988 patent, including cols. 1:9-15, 2:3-12, 4:52-53, 4:60-5:9, 14:19-27, 20:66-21:32, and 21:49-60, Figs. 1, 3A and 8, and abstract, and the corresponding sections of the '137 patent; '988 patent file history, including 10/23/1998 Petition to Make Special; '137 patent file history, including 2/16/1999 Petition to Make Special; IBM DICTIONARY OF COMPUTING (10th ed. 1994) (systematic performance of operations upon data); DICTIONARY OF COMPUTERS, DATA PROCESSING & TELECOMMUNICATIONS (1984) (data processing performed at a single, central location on data from several locations); PLAINTIFF DATATREASURY'S RESPONSE TO DEFENDANTS INGENICO'S THREE MOTIONS FOR SUMMARY JUDGMENT OF INVALIDITY, including all Declarations and Rebuttal Reports of DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000); D014161-185 (DataTreasury Corp.: Review of Business Strategy, dated February 2000); D059384; D056177-182; D034206-207; and D059799.

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Claim Term, Phrase or Clause	SVPCo's Freilminary Construction	Supporting Evidence
	Clai	Claim 42
Preamble: "communication network for the transmission of data within and between one or more remote data processing subsystems, at least one intermediate data collecting subsystem and at least one central subsystem forming a tiered architecture."	a communication network that transmits data within remote data access subsystem(s) (bottom tier), between the remote data access subsystem(s) and their corresponding intermediate data collecting subsystem(s) (intermediate tier), within the intermediate data collecting subsystem(s), between the intermediate data collecting subsystem(s) and their corresponding central data processing subsystems (top tier), and within the central data processing subsystem(s)	The language of the claims; '988 patent, including cols. 4:22-27, 4:60-5:9, 11:13-19, 13:16-14:27 and 20:11-21:32, and Figs. 1, 5 and 7, and the corresponding sections of the '137 patent; '137 patent file history, including 2/16/1999 Petition to Make Special; U.S. Patent Appln. No. 09/454,492 (Ballard) prosecution history, including 7/3/2001 Office Action, 1/2/2002 Amendment in Response to the First Office Action, and 4/8/2003 Amendment; PLAINTIFF DATATREASURY'S RESPONSE TO DEFENDANTS INGENICO'S THREE MOTIONS FOR SUMMARY JUDGMENT OF INVALIDITY, including all Declarations and Rebuttal Reports of DataTreasury's Expert John E. Hiles; and FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000).

Claim Term, Phrase or Clause	SVPCo:s Preliminary Construction	Supporting Evidence
Preamble: "capturing images of documents and receipts"	opto-electronically acquiring images of both documents and receipts, and recording the images in digital electronic form	The language of the claims; '988 patent, including cols. 5:45-57, 7:52-60, 9:9-10:67 and 20:66-21:32, and Figs. 2, 3A and 3B, and the corresponding sections of the '137 patent; '988 patent file history, including 10/23/1998 Petition to Make Special; '137 patent file history, including 2/16/1999 Petition to Make Special; '137 patent file history, including 2/16/1999 Petition to Make Special; 'U.S. Patent Appln. No. 09/454,492 (Ballard) prosecution history, including 7/3/2001 Office Action, 1/2/2002 Amendment in Response to the First Office Action, and 4/8/2003 Amendment; MICROSOFT PRESS COMPUTER DICTIONARY (3d ed. 1997); IBM DICTIONARY OF COMPUTING (10th ed. 1994) (an electronic representation of an original document recorded by a scanning device); FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000); D059384; D056177-182; D034206-207; and D059799.
"transmitting data"	transmitting paper transaction data corresponding to the captured images of documents and receipts	The language of the claims; '988 patent, including cols. 4:60-5:9, 13:16-14:27 and 20:11-65, and Figs. 1, 3A and 4-9, and the corresponding sections of the '137 patent; '988 patent file history, including 10/23/1998 Petition to Make Special; and '137 patent file history, including 2/16/1999 Petition to Make Special.
Relationship among "data" in each claimed component:	the "transmitted data" in each claimed component is the same paper transaction data	The language of the claims; '988 patent, including cols. 4:60-5:9, 13:16-14:27 and 20:11-65, and Figs. 1, 3A and 4-9, and the corresponding sections of the '137 patent.

Claim Term, Phrase or Clause	SVPCo's Preliminary Construction	Supporting Evidence
	Clai	Claim 46
Preamble: "method for transmitting data within and between one or more remote subsystems, at least one intermediate subsystem and at least one central subsystem in a tiered manner."	a method for transmitting data within remote data access subsystem(s) (bottom tier), between the remote data access subsystem(s) and their corresponding intermediate data collecting subsystem(s) (intermediate tier), within the intermediate data collecting subsystem(s), between the intermediate data collecting subsystem(s) and their corresponding central data processing subsystem(s) (top tier), and within the central data	The language of the claims; '988 patent, including cols. 4:22-27, 4:60-5:9, 11:13-19, 13:16-14:27 and 20:11-21:32, and Figs. 1, 5 and 7, and the corresponding sections of the '137 patent; '137 patent file history, including 2/16/1999 Petition to Make Special; U.S. Patent Appln. No. 09/454,492 (Ballard) prosecution history, including 7/3/2001 Office Action, 1/2/2002 Amendment; PLAINTIFF DATATREASURY'S RESPONSE TO DEFENDANTS INGENICOS' THREE MOTIONS FOR SUMMARY JUDGMENT OF INVALIDITY, including all Declarations and Rebuttal Reports of DataTreasury's Expert John E. Hiles; and FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000).
	processing subsystem(s)	

92Na	including cols. 5:45-57, Figs. 2, 3A and 3B, and tent; '988 patent file Make Special; '137 patent to Make Special; U.S. brosecution history, 02 Amendment in 4/8/2003 Amendment; RY (3d ed. 1997); IBM 94) (an electronic corded by a scanning asury Corp. Business Plan, D056177-182; D034206-	including cols. 1:9-15, 7, and Figs. 1, 4 and 6-9, 7 patent; '988 patent file Make Special; '137 patent to Make Special; and U.S. prosecution history, 02 Amendment in 4/8/2003 Amendment.	including cols. 20:11- the '137 patent; and FOCO iness Plan, v1.0.4.5, dated
Supporting Evidence	The language of the claims; '988 patent, including cols. 5:45-57, 7:52-60, 9:9-10:67 and 20:66-21:32, and Figs. 2, 3A and 3B, and the corresponding sections of the '137 patent; '988 patent file history, including 10/23/1998 Petition to Make Special; '137 patent file history, including 2/16/1999 Petition to Make Special; U.S. Patent Appln. No. 09/454,492 (Ballard) prosecution history, including 7/3/2001 Office Action, 1/2/2002 Amendment in Response to the First Office Action, and 4/8/2003 Amendment; MICROSOFT PRESS COMPUTER DICTIONARY (3d ed. 1997); IBM DICTIONARY OF COMPUTING (10th ed. 1994) (an electronic representation of an original document recorded by a scanning device); FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000); D059384; D056177-182; D034206-207; and D059799.	The language of the claims; '988 patent, including cols. 1:9-15, 4:22-27, 4:60-5:9, 11:13-19 and 14:19-27, and Figs. 1, 4 and 6-9, and the corresponding sections of the '137 patent; '988 patent file history, including 10/23/1998 Petition to Make Special; '137 patent file history, including 2/16/1999 Petition to Make Special; and U.S. Patent Appln. No. 09/454,492 (Ballard) prosecution history, including 7/3/2001 Office Action, 1/2/2002 Amendment in Response to the First Office Action, and 4/8/2003 Amendment.	The language of the claims; '988 patent, including cols. 20:11-21:32, and the corresponding sections of the '137 patent; and FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000).
SVPCo's Freliminary Construction	opto-electronically acquiring images of both documents and receipts, and recording the images the in digital electronic form finding images in digital	'remote location(s)', 'intermediate location(s)', and 'central location(s)' are respectively synonymous and used interchangeably with the remote data access subsystem(s), intermediate data collecting subsystem(s), and central data processing subsystem(s) at those locations	"transmitting data" means transmitting at least the paper transaction data extracted from the captured image of both documents and receipts'
Claim Term, Phrese or Cause	"capturing an image of documents and receipts"	"location" and "locations"	Relationship of the "extract[ed] data" to the "transmitt[ed] data":

Supporting Evidence	The language of the claims; '988 patent, including cols. 4:60-5:9, 13:16-14:27 and 20:11-21:32, and Figs. 1, 3A and 4-9, and the corresponding sections of the '137 patent.	The language of the claims; '988 patent, including cols. 4:60-5:9, 13:16-14:27 and 20:11-21:32, and Figs. 1, 3A and 4-9, and the corresponding sections of the '137 patent.
SYPCo's Frestminary Construction	the "data" transmitted in each "transmitting" step is the same extracted paper transaction data	the method steps are performed sequentially
Claim Term, Phrase or Clause	Relationship among "data" in each "transmitting" step:	Temporal relationship of method steps:

CONSTRUCTION OF CLAIM TERMS, PHRASES AND CLAUSES OF U.S. PATENT NO. 6,032,137

Claim Term,	SVPCo's Freliminary Construction	Supporting Evidence
	Cla	Claim 1
Preamble: "system for central management, storage	a system that centrally manages paper transaction data, centrally	The language of the claims; '988 patent, including cols. 3:25-35, 4:60-5:9, 14:19-27, 20:66-21:32, and 21:49-60, and the
and report generation of remotely captured paper	stores paper transaction data, and centrally generates informative	corresponding sections of the '137 patent; '137 patent, including cols. 21:62-22:40 and Fig. 10; '137 patent file history, including
transactions from checks"	reports based on paper transaction	2/16/1999 Petition to Make Special; FOCO D000970-1043 (DataTreasury Com. Business Plan. v1.0.4.5, dated January 2000):
	captured images of checks	D014161-185 (DataTreasury Corp.: Review of Business Strategy, dated February 2000). D059384: D056177-182: D034206-207; and
	Preamble is limiting.	D059799.
"check"	a written order directing a bank or banker to pay money as therein	The language of the claims; '137 patent, including cols. 21:62-22:40 and Fig. 10; Webster's Third New International Dictionary
	stated, but not a "document" or "receipt" as recited in the '988	(1993) (a written order directing a bank or banker to pay money as therein stated); and New Webster's Comprehensive Dictionary
	patent	(1985) (a written order for money drawn on a bank).

	Phrase or Clause **Phrase or Clause** **Phrase or Clause** **Phrase or Clause** **Prefiminary Construction** an image of a paper check must including a payer bank's routing number, a payer bank's count number, a payer bank's check, a payer bank's account number, a payer bank's identification information, and a payer bank's counting information, and a payer bank's count number, a payee bank's identification information. **Subsystem identification** information information that identifies the remote data access subsystem information that is a part of the remote data access subsystem information that is a part of the formation. information information. information that identifies the remote data access subsystem information that is a part of the formation. information information that identifies the remote data access subsystem information informa	PCo's Construction	per check must of the language of the claims; '137 patent, including cols. 21:62-22:40 and Fig. 10; WO99/11021 prosecution history, including original claim 52; '988 patent file history, including 10/23/1998 Petition to Make Special, and 2/5/1999 Amendment and Response, including payer's check, a payer's check, the a check of the claim in an analysis of the claim in an analysis check of the claim in an analysis of the claim in an analysis of the claim in an and Fig. 10; WO99/11021 prosecution history, including 10/23/1998 Petition to have special, and 2/5/1999 Preliminary Amendment. The language of the claims; '137 patent, including original claim 52; '988 patent file history, including 10/23/1998 Petition to have special, and 2/5/1999 Preliminary Amendment. The language of the claims; '137 patent file history, including 2/16/1999 Petition to have special, and 2/5/1999 Preliminary Amendment. The language of the claims; '137 patent file history, including 2/16/1999 Petition to have special, and 2/5/1999 Preliminary Amendment.	identifies the subsystem, or 29:9-10:67, 16:66-19:64, and 20:66-21:32, and Figs. 3A, 3B and 8, and the corresponding sections of the '137 patent; '137 patent, including cols. 21:62-22:40 and Fig. 10; '988 patent file history, including 10/23/1998 Petition to Make Special, and 2/5/1999 Amendment and Response, including p. 4; '137 patent file history, including 2/16/1999 Petition to Make Special; PLAINTIFF DATATREASURY'S RESPONSE TO DEFENDANTS INGENICOS' THREE MOTIONS FOR SUMMARY JUDGMENT OF INVALIDITY, including all Declarations and Rebuttal Reports of DataTreasury's Expert John E. Hiles; FOCO D000970-1043 (DataTreasury Corp. Business Plan, v. 10.4.5, dated Jamesey, 2000). Dol 145, 185, DataTreasury Corp.
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Claim Term, Phrase or Clause	SVPCo's Preliminary Construction	Supporting Evidence
"capturing subsystem identification information" in the context of "capturing paper transaction data further including subsystem identification information"	acquiring the subsystem identification information, and recording the same in digital electronic form	The language of the claims; '988 patent, including cols. 5:45-57, 7:52-60, and 9:9-10:67, and Figs. 2, 3A and 3B, and the corresponding sections of the '137 patent; '137 patent, including cols. 21:62-22:40 and Fig. 10; '988 patent file history, including 10/23/1998 Petition to Make Special, and 2/5/1999 Amendment and Response, including p. 4; '137 patent file history, including 2/16/1999 Petition to Make Special; U.S. Patent Appln. No. 09/454,492 (Ballard) prosecution history, including 7/3/2001 Office Action, 1/2/2002 Amendment; Microsoft Press Computer Dictionary (3d ed. 1997); FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000); and D059799.
"capturing the checks"	opto-electronically acquiring images of checks, and recording the images in digital electronic form	The language of the claims; '988 patent, including cols. 5:45-57, 7:52-60 and 9:9-10:67, and Figs. 2, 3A and 3B, and the corresponding sections of the '137 patent; '137 patent, including cols. 21:62-22:40 and Fig. 10; '988 patent file history, including 10/23/1998 Petition to Make Special; '137 patent file history, including 2/16/1999 Petition to Make Special; U.S. Patent Appln. No. 09/454,492 (Ballard) prosecution history, including 7/3/2001 Office Action, 1/2/2002 Amendment in Response to the First Office Action, and 4/8/2003 Amendment; MICROSOFT PRESS COMPUTER DICTIONARY (3d ed. 1997); FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000); and D059799.

Claim Term, Phrase or Clause	SVPCo's Preliminary Construction	Supporting Evidence
"central" of "central data processing subsystem" coccasing subsystem" i i	a centralized subsystem, that is, a subsystem located at the center of the system communicatively connected, directly or indirectly, to all of the remote data access subsystems and to which all of the remote data access subsystems transmit encrypted images of checks containing paper transaction data and containing subsystem identification information	The language of the claims; '988 patent, including cols. 1:9-15, 4:60-5:9 and 14:19-27, and Figs. 1, 4 and 6-9, and the corresponding sections of the '137 patent; '988 patent file history, including 10/23/1998 Petition to Make Special; '137 patent file history, including 2/16/1999 Petition to Make Special; U.S. Patent Appln. No. 09/454,492 (Ballard) prosecution history, including 7/3/2001 Office Action, 11/2/2002 Amendment; IBM DICTIONARY OF COMPUTING (10th ed. 1994) (centralized network as synonym for star network; a radial, or star-like, configuration of nodes connected to a central controller or computer in which each node exchanges data directly with the central node; Fig. 140); MICROSOFT PRESS COMPUTER DICTIONARY (3d ed. 1997) (each device (node) is connected to a central computer in a star-shaped configuration; a network consisting of a central computer (the hub) surrounded by terminals); DICTIONARY OF COMPUTERS, DATA PROCESSING & TELECOMMUNICATIONS (1984) (centralized network as synonym for star network; a network configuration in which there is only one path between a central or controlling node and each end-point node); DICTIONARY OF INFORMATION TECHNOLOGY (3d ed. 1989) (each node is connected only to one central controller (host)); DICTIONARY OF COMPUTING: DATA COMMUNICATIONS, HARDWARE AND SOFTWARE BASICS, DIGITAL ELECTRONICS (1982); THE NEW IEEE STANDARD DICTIONARY OF ELECTRICAL AND ELECTRONICS TERMS (5th ed. 1993); FOCO D000970-1043 (DataTreasury Corp.: Review of Business Strategy, dated February 2000).

Claim Terin, Phrase or Clause	SVPCo's Preliminary Construction	Supporting Evidence
In the context of a "central data processing subsystem":	centrally systematically performing operations upon both the paper transaction data and the	The language of the claims; '988 patent, including cols. 1:9-15, 2:3-12, 4:52-53, 4:60-5:9, 14:19-27, 20:66-21:32, and 21:49-60, Figs. 1, 3A and 8, and abstract, and the corresponding sections of the '137
"processing the paper transaction data and the	subsystem identification information, necessarily	patent; '988 patent file history, including 10/23/1998 Petition to Make Special; '137 patent file history, including 2/16/1999 Petition
subsystem identification information"	including: decrypting the received encrypted images of	to Make Special; IBM DICTIONARY OF COMPUTING (10th ed. 1994) (systematic performance of operations upon data); DICTIONARY OF
	checks, extracting the paper transaction data and the	(data processing performed at a single, central location on data from
	information from the images,	DEFENDANTS INGENICOS' THREE MOTIONS FOR SUMMARY
	performing meaningful analysis	JUDGMENT OF INVALIDITY, including all Declarations and Rebuttal
	of the paper transaction data and the subsystem identification	Reports of Data Heastify S Expert John E. Hiles, FOCO Doors / 0-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January
	information, and generating	2000); D014161-185 (DataTreasury Corp.: Review of Business
	informative reports based on the	Strategy, dated February 2000); D059384; D056177-182; D034206-
	paper transaction data and the subsystem identification	20/; and D039/99.
	information, in contrast to the	
	processing overhead of operating	
	systems and networks and for	
	protocols	
In the context of a "central	electronically sending both the	The language of the claims; '988 patent, including cols. 1:9-15, 2:3-
data processing subsystem":	extracted paper transaction data	12, 4:60-5:9, 15:31-34, 20:11-65 and 22:9-12, Figs. 1 and 6, and
20 20 20 17 2 20 20 20 39	and subsystem neclinication	abstract, and the corresponding sections of the 137 parent, 700 action file history, including 10/02/1000 Detition to Make Created:
scilling the paper transaction data and the	intollilation in our time central data	fateful file filstory, including 10/23/15981 cuttoff to make Special, 1137 patent file history including 2/16/1999 Petition to Make
subsystem identification	location outside of the central	Special; and FOCO D000970-1043 (DataTreasury Corp. Business
information"	data processing subsystem	Plan, v1.0.4.5, dated January 2000).

Claim Term, Phrase or Clause	SVPCo's Freliminary Construction	* Supporting Evidence
In the context of a "central data processing subsystem": "verifying the paper transaction data and the subsystem identification information"	centrally checking or testing the accuracy, exactness or authenticity of both the extracted paper transaction data and subsystem identification information by comparison with known data or a recognized standard or authority	The language of the claims; '988 patent, including cols. 1:27-39, 2:23-67, 3:1-15, 4:18-21 and 14:62-15:9, Fig. 1, and abstract, and the corresponding sections of the '137 patent; '137 patent, including cols. 21:62-22:40 and Fig. 10; '988 patent file history, including 10/23/1998 Petition to Make Special, 12/29/1998 Office Action, and 2/5/1999 Amendment and Response, including p. 4; '137 patent file history, including 2/16/1999 Petition to Make Special; WO99/11021 prosecution history, including 10/24/2005 Communication; NEW WEBSTER'S COMPREHENSIVE DICTIONARY (1985) (to examine or test the correctness or authenticity of); WEBSTER'S THIRD NEW INTERNATIONAL DICTIONARY (1993) (to check or test the accuracy or exactness of: confirm the truth or truthfulness of by or as if by comparison with known data or a recognized standard or authority); FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000); D014161-185 (DataTreasury Corp.: Review of Business Strategy, dated February 2000); D059384; D056177-182; and D034206-207.

Claim Term, Phrists or Clause In the context of a "central	SVPCo's Freiminary Construction centrally electronically	Supporting Evidence The language of the claims; '988 patent, including cols. 4:60-5:9,
data processing subsystem":	recording both the extracted paper transaction data and subsystem identification information in	7:25-28, 14:19-42, and 16:13-65, Figs. 1 and 6, and the corresponding sections of the '137 patent; '988 patent file history, including 10/23/1998 Petition to Make Special; '137 patent file
data and the subsystem identification information."	permanent or semi-permanent form in auxiliary storage devices that permit later retrieval of that	history, including 2/16/1999 Petition to Make Special; IBM DICTIONARY OF COMPUTING (10th ed. 1994) (The terms storage and memory are sometimes used loosely as synonyms. In a more
	data and information	precise and useful sense, the term memory pertains to the part of storage in which instructions are executed (main storage or execution space) and excludes auxiliary storage devices such as disks, diskettes, mass storage devices, and magnetic tape.);
		MICROSOFT PRESS COMPUTER DICTIONARY (3d ed. 1997) (recording computer data in permanent or semi-permanent form in auxiliary storage devices); FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000); D014161-185
		(DataTreasury Corp.: Review of Business Strategy, dated February 2000); and D059799.
	Claim 26	n 26
Preamble: "method for central management, storage and verification of remotely	method for centrally managing paper transaction data, centrally storing paper transaction data, and	The language of the claims; '988 patent, including cols. 3:25-35, 4:60-5:9, 14:19-27, 20:66-21:32, and 21:49-60, and the corresponding sections of the '137 patent; '137 patent, including
captured paper transactions from checks"	centrally verifying paper transaction data of remotely captured images of checks —	cols. 21:62-22:40 and Fig. 10; '137 patent file history, including 2/16/1999 Petition to Make Special; FOCO D000970-1043 (DataTreasury Corp. Business Plan. v1.0.4.5, dated January 2000):
		D014161-185 (DataTreasury Corp.: Review of Business Strategy, dated February 2000); D059384; D056177-182; D034206-207; and D059799.

SVECo's Supporting Evidence	accuracy, exactness or authenticity of the extracted paper transaction data by comparison with known data or a recognized remaining. Preamble is limiting. Preamble is large and testing the extracted paper authority. Preamble is large and testing the corresponding sections of the '137 patent, '137 patent, including cols. 21:62-22:40 and Fig. 10; '988 patent file history, including 20/16/1999 Petition to Make Special; '137 patent, including cols. 21:62-22:40 and Fig. 10; '988 patent file history, including 20/16/1999 Petition to Make Special; NEW WEBSTER's COMPREHENSIVE DICTIONARY (1985) (to examine or test the correctness or authenticity of); WEBSTER's THIRD NEW INTERNATIONAL DICTIONARY (1993) (to check or test the accuracy or exactness of: confirm the truth or truthfulness of by or as if by comparison with known data or a recognized standard or authority); POCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000); D014161-185 (DataTreasury Corp.: Review of Business Strategy, dated February 2000); D059384; D056177-182; and D034206-207.	an electronic representation of 7:52-60, and 20:66-21:32, and Fig. 3B, and the corresponding digital bitmap representation called a Bitmap Image, digitally recorded by an opto-electronic scanning or other recording device an electronic representation of 7:52-60, and 20:66-21:32, and Fig. 3B, and the corresponding sections of the '137 patent; '988 patent file history, including 10/23/1998 Petition to Make Special, and 2/5/1999 Amendment and Response, including p. 4; '137 patent file history, including 2/16/1999 Petition to Make Special; IBM DICTIONARY OF COMPUTING (10th ed. 1994) (an electronic representation of an original document recorded by a scanning device); FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated to a scanning or other recorded by a scanning device); FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated to a scanning or other recorded by a scanning device); FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated to a scanning or other recording to a scanning device); FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated to a scanning or other recording to a scanning
S. S. Feliminar	centrally checking or accuracy, exactness or authenticity of the extransaction data by con with known data or a restandard or authority Preamble is limiting.	an electronic representation an original check, such as a digital bitmap representation called a Bitmap Image, digit recorded by an opto-electron scanning or other recording device
Claim Term, Phrase or Clause	Preamble: "verification of remotely captured paper transactions"	"mage"

Claim Term, Phrase or Clause	SVPCo's Frelintinary Construction	Supporting Evidence
"subsystem identification information"	information that identifies the remote data access subsystem, or a subsystem that is a part of the remote data access subsystem	The language of the claims; '988 patent, including cols. 7:52-8:43, 9:9-10:67, 16:66-19:64 and 20:66-21:32, and Figs. 3A, 3B and 8, and the corresponding sections of the '137 patent; '137 patent, including cols. 21:62-22:40 and Fig. 10; '988 patent file history, including 10/23/1998 Petition to Make Special, and 2/5/1999 Amendment and Response, including p. 4; '137 patent file history, including 2/16/1999 Petition to Make Special; PLAINTIFF DATATREASURY'S RESPONSE TO DEFENDANTS INGENICOS' THREE MOTIONS FOR SUMMARY JUDGMENT OF INVALIDITY, including all Declarations and Rebuttal Reports of DataTreasury's Expert John E. Hiles; FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000); D014161-185 (DataTreasury Corp.: Review of Business Strategy, dated February 2000); D059384; D056177-182; D034206-207; and D059799.
"said transaction data including a payer bank's identification number, a payer bank's routing number, a payer bank's routing information, a payer's account number, a payer's check, a payer bank's draft, a check amount, a payee bank's identification number, a payee bank's routing information, and a payee's account number"	an image of a paper check must include at least each of the following paper transaction data and no less: a payer bank's identification number, a payer bank's routing number, a payer bank's routing information, a payer's account number, a payer's check, a payer bank's draft, a check amount, a payee bank's identification number, a payee bank's routing information, and a payee's account number	The language of the claims; '137 patent, including cols. 21:62-22:40 and Fig. 10; WO99/11021 prosecution history, including original claim 52; '988 patent file history, including 10/23/1998 Petition to Make Special, and 2/5/1999 Amendment and Response, including p. 4; and '137 patent file history, including 2/16/1999 Petition to Make Special, and 2/5/1999 Preliminary Amendment.

Claim Term, Phrase or Clause	SVPCo's Preliminary Construction	Supporting Evidence
"central location"	"central location" is synonymous and used interchangeably with a central	The language of the claims; '988 patent, including cols. 1:9-15, 4:60-5:9 and 14:19-27, and Figs. 1, 4 and 6-9, and the corresponding sections of the '137 patent; '988 patent file history,
	data processing subsystem at that location: a centralized subsystem,	including 10/23/1998 Petition to Make Special; '137 patent file history, including 2/16/1999 Petition to Make Special; U.S. Patent
	that is, a subsystem located at the center of the system communicatively connected,	Appln. No. 09/454,492 (Ballard) prosecution history, including 7/3/2001 Office Action, 1/2/2002 Amendment in Response to the First Office Action, and 4/8/2003 Amendment; IBM DICTIONARY
	directly or indirectly, to all of the remote data access subsystems	OF COMPUTING (10th ed. 1994) (centralized network as synonym for star network; a radial, or star-like, configuration of nodes connected
	and to wnich all of the remote data access subsystems transmit encrypted images of checks	data directly with the central node; Fig. 140); Microsoft Press Computer Dictionary (3d ed. 1997) (each device (node) is
	containing paper transaction data and encrypted subsystem	connected to a central computer in a star-shaped configuration; a network consisting of a central computer (the hub) surrounded by
	identification information	terminals); DICTIONARY OF COMPUTERS, DATA PROCESSING & TELECOMMUNICATIONS (1984) (centralized network as synonym for star network; a network configuration in which there is only one
		path between a central or controlling node and each end-point node); DICTIONARY OF INFORMATION TECHNOLOGY (3d ed. 1989) (each node is connected only to one central controller (host)):
		DICTIONARY OF COMPUTING: DATA COMMUNICATIONS, HARDWARE AND SOFTWARE BASICS, DIGITAL ELECTRONICS (1982); THE NEW IFFE STANDARD DICTIONARY OF FI ECTRICAL AND RIFECTRONICS
		TERMS (5th ed. 1993); FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000); and D014161-185
		(DataTreasury Corp.: Review of Business Strategy, dated February 2000).

Claim Term, Phrase or Clause	SVPCo's Pretiminary Construction	Supporting Evidence
"collecting [paper] transaction data at a central location"	gathering together or accumulating extracted paper transaction data by a central data processing subsystem	The language of the claims; '988 patent, including cols. 4:60-5:9 and 14:28-42, and Figs. 1 and 6, and the corresponding sections of the '137 patent; '988 patent file history, including 10/23/1998 Petition to Make Special; '137 patent file history, including 2/16/1999 Petition to Make Special; New Webster's Comprehensive Dictionary (1985) (to gather; to accumulate); and FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000).
"processing [paper] transaction data at a central location"	centrally systematically performing operations upon the paper transaction data, necessarily including: decrypting the received encrypted images of checks, extracting the paper transaction data from the images, performing meaningful analysis of the paper transaction data, and generating informative reports based on the paper transaction data, in contrast to the processing overhead of operating systems and networks and for implementing communication protocols	The language of the claims; '988 patent, including cols. 1:9-15, 2:3-12, 4:52-53, 4:60-5:9, 14:19-27, 20:66-21:32, and 21:49-60, Figs. 1, 3A and 8, and abstract, and the corresponding sections of the '137 patent; '988 patent file history, including 10/23/1998 Petition to Make Special; '137 patent file history, including 2/16/1999 Petition to Make Special; IBM DICTIONARY OF COMPUTING (10th ed. 1994) (systematic performance of operations upon data); DICTIONARY OF COMPUTERS, DATA PROCESSING & TELECOMMUNICATIONS (1984) (data processing performed at a single, central location on data from several locations); PLAINTIFF DATATREASURY'S RESPONSE TO DEFENDANTS INGENICOS' THREE MOTIONS FOR SUMMARY JUDGMENT OF INVALIDITY, including all Declarations and Rebuttal Reports of DataTreasury's Expert John E. Hiles; FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000); D014161-185 (DataTreasury Corp.: Review of Business Strategy, dated February 2000); D059384; D056177-182; D034206-2072, and D050709

Claim Term, Phrase or Clause	SVPCo's Preliminary Construction	Supporting Evidence
"sending [paper] transaction data at a central location"	electronically sending the extracted paper transaction data from the central data processing subsystem to a location outside of the central data processing subsystem	The language of the claims; '988 patent, including cols. 1:9-15, 2:3-12, 4:60-5:9, 15:31-34, 20:11-65 and 22:9-12, Figs. 1 and 6, and abstract, and the corresponding sections of the '137 patent; '988 patent file history, including 10/23/1998 Petition to Make Special; '137 patent file history, including 2/16/1999 Petition to Make Special; and FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000).
"storing [paper] transaction data at a central location"	centrally electronically recording the extracted paper transaction data in permanent or semi-permanent form in auxiliary storage devices that permit later retrieval of that data	The language of the claims; '988 patent, including cols. 4:60-5:9, 7:25-28, 14:19-42, and 16:13-65, Figs. 1 and 6, and the corresponding sections of the '137 patent; '988 patent file history, including 10/23/1998 Petition to Make Special; '137 patent file history, including 2/16/1999 Petition to Make Special; IBM DICTIONARY OF COMPUTING (10th ed. 1994) (The terms storage and memory are sometimes used loosely as synonyms. In a more precise and useful sense, the term memory pertains to the part of storage in which instructions are executed (main storage or execution space) and excludes auxiliary storage devices such as disks, diskettes, mass storage devices, and magnetic tape.); MICROSOFT PRESS COMPUTER DICTIONARY (3d ed. 1997) (recording computer data in permanent or semi-permanent form in auxiliary storage devices); FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000); D014161-185 (DataTreasury Corp.: Review of Business Strategy, dated February 2000); and D059799.

Clatin Term, Phrase or Clause	SVPCo's Breliminary Construction Clai	Claim 42
Preamble: "system for central management, storage and report generation of remotely captured paper transactions from checks".	a system that centrally manages paper transaction data, centrally stores paper transaction data, and centrally generates informative reports based on paper transaction data of remotely captured images of checks	The language of the claims; '988 patent, including cols. 3:25-35, 4:60-5:9, 14:19-27, 20:66-21:32, and 21:49-60, and the corresponding sections of the '137 patent; '137 patent, including cols. 21:62-22:40 and Fig. 10; '137 patent file history, including 2/16/1999 Petition to Make Special; FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000); D014161-185 (DataTreasury Corp.: Review of Business Strategy, dated February 2000); D059384; D056177-182; D034206-207; and D059799.
"one or more remote data access subsystems for verifying transaction data from the checks"	remote data access subsystem(s) check or test the accuracy, exactness or authenticity of the paper transaction data by comparison with known data or a recognized standard or authority	The language of the claims; '988 patent, including cols. 1:27-39, 2:23-67, 3:1-15, 4:18-21 and 14:62-15:9, Fig. 1, and abstract, and the corresponding sections of the '137 patent; '137 patent, including cols. 7:51-8:43 and 21:62-22:40 and Figs. 2, 3A, 3B and 10; '988 patent file history, including 10/23/1998 Petition to Make Special, 12/29/1998 Office Action, and 2/5/1999 Amendment and Response, including p. 4; '137 patent file history, including 2/16/1999 Petition to Make Special; WO99/11021 prosecution history, including 10/24/2005 Communication; NEW WEBSTER'S COMPREHENSIVE DICTIONARY (1985) (to examine or test the correctness or authenticity of); WEBSTER'S THIRD NEW INTERNATIONAL DICTIONARY (1993) (to check or test the accuracy or exactness of: confirm the truth or truthfulness of by or as if by comparison with known data or a recognized standard or authority); FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000); D014161-185 (DataTreasury Corp.: Review of Business Strategy, dated February 2000); D059384; D056177-182; and D034206-207.

Glatin Term, Phrase or Clause	SVPCo's Freilmiliary Construction	Supporting Evidence
"subsystem identification information"	information that identifies the remote data access subsystem, or a subsystem that is a part of the remote data access subsystem	The language of the claims; '988 patent, including cols. 7:52-8:43, 9:9-10:67, 16:66-19:64, and 20:66-21:32, and Figs. 3A, 3B and 8, and the corresponding sections of the '137 patent; '137 patent, including cols. 21:62-22:40 and Fig. 10; '988 patent file history, including 10/23/1998 Petition to Make Special, and 2/5/1999 Amendment and Response, including p. 4; '137 patent file history, including 2/16/1999 Petition to Make Special; PLAINTIFF DATATREASURY'S RESPONSE TO DEFENDANTS INGENICOS' THREE MOTIONS FOR SUMMARY JUDGMENT OF INVALIDITY, including all Declarations and Rebuttal Reports of DataTreasury's Expert John E. Hiles; FOCO D000970-1043 (DataTreasury Corp.: Review of Business Strategy, dated February 2000); D059384; D056177-182; D034206-207; and D059799.
"capturing the checks"	opto-electronically acquiring images of checks, and recording the images in digital electronic form	The language of the claims; '988 patent, including cols. 5:45-57, 7:52-60, and 9:9-10:67, and Figs. 2, 3A and 3B, and the corresponding sections of the '137 patent; '137 patent, including cols. 21:62-22:40 and Fig. 10; '988 patent file history, including 10/23/1998 Petition to Make Special; '137 patent file history, including 2/16/1999 Petition to Make Special; U.S. Patent Appln. No. 09/454,492 (Ballard) prosecution history, including 7/3/2001 Office Action, 1/2/2002 Amendment in Response to the First Office Action, and 4/8/2003 Amendment; MICROSOFT PRESS COMPUTER DICTIONARY (3d ed. 1997); FOCO D000970-1043 (DataTreasury Corp. Business Plan, v1.0.4.5, dated January 2000); and D059799.

Construction Supporting Evidence	Claim 43	ging Illy 1, and m	identifies the The language of the claims; '988 patent, including cols. 7:52-8:43, subsystem, or and the corresponding sections of the '137 patent; '137 patent, including cols. 21:62-22:40 and Fig. 10; '988 patent file history, including 10/23/1998 Petition to Make Special, and 2/5/1999 Amendment and Response, including p. 4; '137 patent file history, including 2/16/1999 Petition to Make Special; PLANTIFF DATATREASURY'S RESPONSE TO DEFENDANTS INGENICOS' THREE MOTIONS FOR SUMMARY JUDGMENT OF INVALIDITY, including all Declarations and Rebuttal Reports of DataTreasury's Expert John E. Hiles; FOCO D000970-1043 (DataTreasury Corp.: Review of Business Strategy, dated February 2000); D059384; D056177-182; D034206-207; and D059799.
SVPC SVPC		method for centrally managing paper transaction data, centrally storing paper transaction data, and centrally verifying paper transaction data extracted from remotely captured images of checks	information that identifies the remote data access subsystem, or a subsystem that is a part of the remote data access subsystem
Claim Term, Phrase or Clause		Preamble: "method for central management, storage and verification of remotely captured paper transactions from checks"	"subsystem identification information"

Chain Term, Phrase or Clause "verifying the transaction data from the check"
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